

STANFIELD IRRIGATION DISTRICT

September 26, 2007

Environmental Protection Agency
Regulatory Public Docket (750 2P)
Office of Pesticide Programs
1200 Pennsylvania Avenue, NW
Washington DC 20460-0001

RE: Docket ID # EPA-HQ-OPP-2007-0588

To Whom It May Concern:

Aquatic vegetation weed control is a very serious problem within our irrigation systems throughout Stanfield Irrigation District (SID) canals and ditches. SID is a closed system (water will not go back to any natural water ways). Control of this aquatic vegetation is a costly but necessary part of our maintenance.

Most all of SID's farmers use sprinkler pivot systems or drip irrigation and 90% of all their water is pumped directly out of the main canal. Without good control of Aquatic weeds, their screening systems will begin to plug up. We need to keep these canals open; Magnacide-H is the only economical way to move water throughout the irrigation season.

SID has been using Magnacide-H (Acrolein) herbicide in our 37 miles of irrigation canals for over 25 years. We are not a large District, with a service area under 11,000 acres. During that 25 year time, we have never seen any evidence of damage to crops, or dead animals, or birds.

We are treating irrigation canals/ditches and our systems are not intended to supply any drinking water to anyone. We do have a notification list for those farmers who wish not to irrigate during treatment. Magnacide-H Herbicide is the best and fastest working product available and because this product breaks down quickly, our farmers can start their irrigation system sooner.

SID is part of the Umatilla Basin Phase II project which has over 6 miles of new concrete lined main canal with a telemetry system to open and close gates in supplying water to the growers and district. Using mechanical control, such as dragging or dipping out aquatic vegetation, has its own set of problems damaging the infrastructure. Also, it is very time consuming and costly.

September 26, 2007

Magnacide-H is also costly, so that SID will use it only when necessary. Our District follows the label regulations, and all laws which pertain to the application. All applications are made by licensed and trained applicators. Also the District complies with Oregon Department of Environmental Quality with our NPDES permit, which is becoming costly.

We support re-registration of Magnacide-H for the control of aquatic vegetation within irrigation facilities as applied according the label requirements, and I stress the importance of having Magnacide-H Herbicide available with no further restrictions.

Sincerely,

Ray Kopacz

District Manager

Cc Anita Winkler

Dale Carpenter